

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC, Plaintiff, v. GOOGLE INC., Defendant.	CIVIL ACTION NO. 2:17-CV-442-JRG LEAD CASE PATENT CASE JURY TRIAL DEMANDED
v. SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS CO., LTD., Defendants.	CIVIL ACTION NO. 2:17-CV-441-JRG CONSOLIDATED CASE

SEVEN NETWORKS' [PROPOSED] REQUESTS FOR PRODUCTION RELATING TO VENUE

Plaintiff SEVEN Networks, LLC serves the following requests for production on Defendant Google Inc. in accordance with the Federal Rules of Civil Procedure 26 and 34 and this Court's local rules and orders.

REQUESTS FOR PRODUCTION

1. Documents sufficient to identify all physical property owned, leased, rented, used, or otherwise possessed or controlled by Google located within the Eastern District of Texas, including but not limited to stores, warehouses, facilities or other space, inventory, equipment, servers, and other infrastructure relating to goods or services provided by Google, since December 13, 2011. Such documents should describe the property, identify the location of the

property, how long such property has been located within the Eastern District of Texas, and describe what the property is used for.

2. Documents sufficient to fully describe or document the decision to place Google's Edge nodes in the Eastern District of Texas.

3. All agreements relating to physical property owned, leased, rented, used, or otherwise possessed or controlled by Google and located within the Eastern District of Texas since December 13, 2011.

4. Documents sufficient to identify all Google employees who have (a) worked in, (b) resided in, or (c) supported or worked on Google's physical equipment or software located in, the Eastern District of Texas since December 13, 2011. Such documents should provide each employee's name, title, home address, work address, a description of the employee's responsibilities, a description of the work performed by the employee within the Eastern District of Texas, whether such employees stored any Google information, materials, products, or software within the District, and the duration of employment.

5. Documents sufficient to identify and describe all locations within the Eastern District of Texas where Google employees have conducted any amount of work since December 13, 2011.

6. Agreements or other documents sufficient to fully describe any conditions of employment for Google's employees who have (a) worked in, (b) resided in, or (c) supported or worked on Google's physical equipment or software located in, the Eastern District of Texas since December 13, 2011. Such documents would include any employee agreements, employee

handbooks, and other documents describing the responsibilities and obligations of said employees.

7. All marketing, advertising, promotional materials, web pages, or directory listings identifying Google's presence within the Eastern District of Texas since December 13, 2011. By way of example only, such documents would include web pages identifying the location of Google's Edge Nodes within the Eastern District of Texas.

8. Documents sufficient to identify, on a month-by-month or other reasonable periodic basis, the nature, type, and amount of information present on each piece of Google equipment located within the Eastern District of Texas. By way of example only, such documents should include information about the number of bytes of information and number of files on each piece of equipment, and identify the nature and type of the information stored—for example, how much of the information on each device is content, and what type of content, and how much of the information is software and the purpose of the software.

9. Documents sufficient to identify the nature, type, and amount of information sent from each piece of Google equipment located within the Eastern District of Texas to other computers located in the Eastern District of Texas.

10. Documents sufficient to fully describe the nature of any relationships between Google and companies located in the Eastern District of Texas, including but not limited to Suddenlink Communications, Cable One, and the Genesis Group. By way of example only, such documents should include any agreement between the parties and describe the nature and quantity of the services and data provided by Google, how Google provides such services and

data, the employees involved in providing such services and data, and how such services and data are used in the Eastern District of Texas.

Dated: October 11, 2017

Respectfully submitted,

/s/

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